FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

North American Van Lines
5001 U.S. Highway 30 West
Fort Wayne, Indiana 46818

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 003-13899-00208	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:August 19, 2002 Expiration Date: August 19, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary motor freight and warehousing source.

Authorized Individual:	Vice President of Fleet Services
Source Address:	5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address:	P.O. Box 988, Fort Wayne, Indiana 46801-0988
General Source Phone Number:	260 - 429 - 1390
SIC Code:	4213
County Location:	Allen County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.

(b) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.

(1) Two (2) natural gas fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;

(2) One (1) natural gas fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;

(3) Thirty-seven (37) natural gas fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;

(4) Forty-two (42) natural gas fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;

(5) One (1) natural gas fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)

(6) Two (2) natural gas fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; and (326 IAC 6-2-3)

(7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. (326 IAC 6-2-3)

(b) Two (2) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel (diesel fuel only) transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Closed loop heating and cooling systems.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.

(k) Stationary fire pumps.

(l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM , the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; and

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit,

including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as

defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Indianapolis Offices, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAQ / Indianapolis Offices, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those

emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the

request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification

by the “authorized individual” as defined by 326 IAC 2-1.1-1.

(c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Any change or modification that increases the potential to emit PM to 250 tons per year or more shall cause this source to become a major source pursuant to 326 IAC 2-2, PSD, and shall require prior OAQ approval.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance

with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP);

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Three (3) spray paint booths

(a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

(a) The total amount of VOC delivered to the applicators at the three (3) spray paint booths (E1, E2, and E3) shall not exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7, not applicable.

(b) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.1, that the volatile organic compound (VOC) emissions from the three (3) paint booths (E1, E2, and E3) shall not exceed 8.25 tons per month has not been included in the renewal because the limit in Condition D.1.1(a) shall limit the potential to emit VOC from the entire source to less than one hundred (100) tons of VOC per year. Thus, the requirements of 326 IAC 2-7 are still not applicable and Condition D.1.1 of FESOP 003-5768-00208 is hereby rescinded.

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

(a) The total worst case single HAP delivered to the coating applicators consisting of the three (3) spray paint booths (E1, E2, and E3) shall not exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

(b) The total combination of HAPs delivered to the coating applicators consisting of the three (3) spray paint booths (E1, E2, and E3), shall not exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

(c) The requirements from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.2 that the amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month has not been included in the renewal because the limit in Condition D.1.2(a) and (b) shall make the requirements of 326 IAC 2-7 still not applicable. Thus, Condition D.1.2 of FESOP 003-5768-00208 is hereby rescinded.

D.1.3 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996 and 40 CFR 52 Subpart P, the PM from the three (3) paint booths (E1, E2, and E3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B.13 - Preventive Maintenance Plan, of this permit, is required for the three (3) spray paint booths and the dry filters.

Compliance Determination Requirements

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitation contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.6 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.

D.1.7 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.8 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.

D.1.9 Particulate [326 IAC 6-3-2(d)]

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996, 326 IAC 6-3-2(d) and in order to comply with Condition D.1.3, the dry filters for particulate control shall be in operation at all times in accordance with manufacturer's specifications when the three (3) spray paint booths (E1, E2, and E3) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.10 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, and E3) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Nonapplicability of Daily Visible Emissions Notations

The requirement from FESOP 003-5768-00208, issued on December 9, 1996, Condition D.1.7 to perform daily visible emissions notations has not been included in the renewal. This requirement is no longer applicable because the daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required by Condition D.1.10 are sufficient compliance monitoring requirements to ensure compliance with the applicable rules. Thus, Condition D.1.7 of FESOP 003-5768-00208 is hereby rescinded.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.12 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1 and the HAPs usage limits and the HAPs emission limits established in Condition D.1.2.

(1) The amount and VOC and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup and degreasing solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC, as well as total individual HAP and total combination of HAPs usage for each month; and

(4) The weight of VOCs, as well as total individual and total HAPs emitted for each compliance period.

(b) To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Two (2) fuel oil storage tanks

(b) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no emission limitations and standards, compliance determination requirements, and compliance monitoring requirements for these storage tanks.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.1 Record Keeping Requirements [326 IAC 12] [40 CFR 60.116b Subpart Kb]

The Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.

(1) Two (2) natural gas fired air make up units, heat input capacity: 3.85 million British thermal units per hour, each;

(2) one (1) natural gas fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;

(3) Thirty-seven (37) natural gas fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;

(4) Forty-two (42) natural gas fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;

(5) One (1) natural gas fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)

(6) Two (2) natural gas fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; and (326 IAC 6-2-3)

(7) One (1) natural gas fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. (326 IAC 6-2-3);

(b) Two (2) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel (diesel fuel only) transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Closed loop heating and cooling systems.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.

(k) Stationary fire pumps.

(l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3(e), the PM emissions from the three (3) insignificant boilers constructed in 1977, rated at 3.00, 3.00, and 1.56 million British thermal units per hour respectively, shall not exceed 0.6 pound per million British thermal units.

D.3.2 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), the PM emissions from the one (1) insignificant boiler constructed in 1994, rated at 0.63 million British thermal units per hour, shall not exceed 0.6 pound per million British thermal units.

D.3.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2, The following requirements shall apply to the operation of the insignificant cold cleaning degreasers, constructed in 2000:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.4 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

Any change or modification that increases the potential to emit VOC to more than 2.74 tons per year from the insignificant maintenance degreasers, may cause the potential to emit VOC for the entire source to be greater than one hundred (100) tons per year and make the requirements of 326 IAC 2-7 applicable and shall require prior IDEM, OAQ, approval.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Three (3) spray paint booths, known as E1, E2, and E3
Parameter: VOC delivered to the applicators
Limit**:** Total not to exceed 95.5 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Total VOC usage (tons)	Total VOC usage (tons)	Total VOC usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Three (3) spray paint booths, known as E1, E2, and E3
Parameter: Individual HAP delivered to the applicators
Limit**:** Total not to exceed 9.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Three (3) spray paint booths, known as E1, E2, and E3
Parameter: Combination of HAPs delivered to the applicators
Limit**:** Total not to exceed 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR: _____

Month	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)	Combination of HAPs Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation**:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	

Probable Cause of Deviation:
Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

August 19, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document for
Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name: **North American Van Lines**
Source Location: **5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818**
County: **Allen**
SIC Code: **4213**
Operation Permit No.: **F 003-13899-00208**
Permit Reviewer: **Michael S. Schaffer**

On July 8, 2002, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Gazette, Fort Wayne, Indiana, stating that North American Van Lines had applied for a Federally Enforceable State Operating Permit (FESOP) renewal to continue to operate three (3) spray paint booths with dry filters to control PM overspray. The notice also stated that OAQ proposed to issue a FESOP renewal for this operation and provided information on how the public could review the proposed FESOP renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP renewal should be issued as proposed.

On July 19, 2002, Jennifer Dorn, the Allen County inspector, submitted comments on the proposed FESOP renewal. The comments are as follows: The permit language, if changed, has deleted language as ~~strikeouts~~ and new language **bolded.**

Comment 1:

The responsible official listed should not be Steven Moeller. It should be the Vice President of Fleet Services.

Response 1:

Due to the comment above and July 13, 2002 FESOP changes, Condition A.1 will be changed as follows:

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary motor freight and warehousing source.

Authorized Individual:	~~Steven Moeller~~ **Vice President of Fleet Services**
Source Address:	5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address:	P.O. Box 988, Fort Wayne, Indiana 46801-0988
General Source Phone Number:	260 - 429 - 1390
SIC Code:	4213
County Location:	Allen County
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded)**:

Change 1:

The following updates have been made to incorporate the 326 IAC 6-3 revisions that became effective on June 12, 2002.

The following requirement from the previous version of 326 IAC 6-3 (Process Operations) has been approved into the SIP and will remain the applicable requirement until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action. The following change has been made to clarify that the authority for this condition is from the SIP:

D.1.3 Particulate Matter (PM) ~~[326 IAC 6-3-2]~~ [40 CFR 52 Subpart P]

Pursuant to **FESOP 003-5768-00208, issued on December 9, 1996 and 40 CFR 52 Subpart P**, the PM from the three (3) paint booths (E1, E2, and E3) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Previously, the terms “particulate” and “particulate matter” were both used in the rule, but now the term “particulate” is used consistently in 326 IAC 6-3. Also, the revised rule requires particulate from the surface coating to be controlled by a dry particulate filter and operated in accordance with manufacturer’s specifications, therefore, the following changes were made to Condition D.1.9:

D.1.9 Particulate ~~Matter (PM)~~ **[326 IAC 6-3-2(d)]**

Pursuant to FESOP 003-5768-00208, issued on December 9, 1996, 326 IAC 6-3-2(d) and ~~i~~in order to comply with Condition D.1.3, the dry filters for ~~PM~~ **particulate** control shall be in operation at all times **in accordance with manufacturer’s specifications** when the three (3) spray paint booths (E1, E2, and E3) are in operation.

Change 2:

In order to explain what the compliance determination period is defined as more clearly, Conditions D.1.1(a) and D.1.2(a) and (b) as well as the three (3) quarterly report forms have been revised as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4]

(a) The total amount of VOC delivered to the applicators at the three (3) spray paint booths (E1, E2, and E3) shall not exceed 95.5 tons per twelve (12) consecutive month period~~, rolled on a monthly basis~~ **with compliance determined at the end of each month**. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7, not applicable.

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

(a) The total worst case single HAP delivered to the coating applicators consisting of the three (3) spray paint booths (E1, E2, and E3) shall not exceed 9.0 tons per twelve (12) consecutive month period~~, rolled on a monthly basis~~ **with compliance determined at the end of each month**. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

(b) The total combination of HAPs delivered to the coating applicators consisting of the three (3) spray paint booths (E1, E2, and E3), shall not exceed 24.0 tons per twelve (12) consecutive month period~~, rolled on a monthly basis~~ **with compliance determined at the end of each month**. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Three (3) spray paint booths, known as E1, E2, and E3
Parameter: VOC delivered to the applicators
Limit: Total not to exceed 95.5 tons per twelve (12) consecutive month period~~, rolled on a monthly basis~~ **with compliance determined at the end of each month.**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: North American Van Lines
Source Address: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address: P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.: F 003-13899-00208
Facilities: Three (3) spray paint booths, known as E1, E2, and E3
Parameter: Individual HAP delivered to the applicators
Limit: Total not to exceed 9.0 tons per twelve (12) consecutive month period~~, rolled on a monthly~~

~~basis~~ **with compliance determined at the end of each month**.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	North American Van Lines
Source Address:	5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
Mailing Address:	P.O. Box 988, Fort Wayne, Indiana 46818
FESOP No.:	F 003-13899-00208
Facilities:	Three (3) spray paint booths, known as E1, E2, and E3
Parameter:	Combination of HAPs delivered to the applicators
Limit:	Total not to exceed 24.0 tons per twelve (12) consecutive month period~~, rolled on a monthly basis~~ **with compliance determined at the end of each month**.

August 19, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**North American Van Lines**
Source Location:	**5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818**
County:	**Allen County**
SIC Code:	**4213**
Operation Permit No.:	**F 003-13899-00208**
Permit Reviewer:	**Michael S. Schaffer**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from North American Van Lines relating to the operation of a motor freight and warehousing source. North American Van Lines was issued FESOP 003-5768-00208 on December 9, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Three (3) spray paint booths, known as E1 (Paint Rooms A and D), E2 (Paint Room B) and E3 (Paint Room C), constructed prior to 1975, equipped with three (3) low pressure air atomized spray guns that operate one (1) at a time, and dry filters for overspray control, exhausting to stacks E1, E2, and E3, respectively, capacity: 0.38 trailers per hour, each.

(b) Two (2) fuel oil storage tanks, known as Tanks 1 and 2, constructed in 1990, capacity: 15,000 gallons, each.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour. including the following.

(1) Two (2) natural gas-fired air make up units, heat input capacity: 3.85 million British

thermal units per hour, each;

(2) One (1) natural gas-fired air make up unit, heat input capacity: 2.79 million British thermal units per hour;

(3) Thirty-seven (37) natural gas-fired tube heaters, heat input capacity: 0.10 million British thermal units per hour, each;

(4) Forty-two (42) natural gas-fired space heaters, heat input capacity: 0.16 million British thermal units per hour, each;

(5) One (1) natural gas-fired boiler, constructed in 1994, heat input capacity: 0.63 million British thermal units per hour; (326 IAC 6-2-4)

(6) Two (2) natural gas-fired boilers, constructed 1977, heat input capacity: 3.00 million British thermal units per hour, each; and (326 IAC 6-2-3)

(7) One (1) natural gas-fired boiler, constructed 1977, heat input capacity: 1.56 million British thermal units per hour. (326 IAC 6-2-3)

(b) Two (2) waste oil heat exchangers, heat input capacity: 0.5 million British thermal units per hour, each.

(c) Combustion source flame safety purging on startup.

(d) A gasoline fuel (diesel fuel only) transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(e) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.

(f) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Closed loop heating and cooling systems.

(h) Paved and unpaved roads and parking lots with public access.

(i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(j) Two (2) diesel powered emergency generators, power output capacity: 4,600 horsepower, total.

(k) Stationary fire pumps.

(l) Maintenance cold cleaning degreasers, including Crystal Clean units with capacities less than 15 gallons each, constructed in 2000, equipped with remote solvent reservoirs, using only non-HAP materials and having a VOC usage rate less than 15 pounds per day, total. (326 IAC 8-3-2)

Existing Approval

FESOP 003-5768-00208, issued on December 9, 1996.

All conditions from the previous approval were incorporated into this FESOP, except the following:

FESOP 003-5768-00208, issued on December 9, 1996;

(a) Condition D.1.1, Volatile Organic Compound which states: The volatile organic compound (VOC) emissions from the three (3) paint booths (E1, E2, and E3) shall not exceed 8.25 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated: The VOC Emissions from the three (3) paint booths are limited in this permit to no more than 95.5 tons per twelve (12) consecutive month period, total. This, in addition to 0.07 of VOC tons per year from the two (2) fuel oil storage tanks and 4.32 tons of VOC per year from the insignificant activities, results in a total potential to emit of less than one hundred (100) tons per year at the entire source. Therefore, the requirements of 326 IAC 2-7 still do not apply.

(b) Condition D.1.2, Hazardous Air Pollutants, which states: The amount of any single hazardous air pollutant (HAP) delivered to the applicators shall not exceed 0.75 tons per month and the amount of any combination of HAPs delivered to the applicators shall not exceed 2.00 tons per month.

Reason not incorporated: Individual HAP emissions shall be limited to ten (10) tons per twelve (12) consecutive month period and combination of HAPs emissions shall be limited to twenty-five (25) tons per twelve consecutive month period instead of monthly fixed emission limits.

(c) Condition D.1.7, Daily Visible Emissions Notations, which states: Daily visible emissions notations of the spray booth stack exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously “normal” means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: The daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required in this FESOP are sufficient compliance monitoring requirements to ensure compliance with the applicable rules. Therefore, Daily Visible Emissions Notations will not be incorporated in this renewal.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 8, 2001. Additional information was received on February 21, 2002, March 29, 2002, April 3 and 16, 2002.

Emission Calculations

See pages 1 through 9 of 9 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	**Unrestricted Potential Emissions** (tons/year)
PM	44.9
PM_{10}	44.8
SO_2	0.138
VOC	134
CO	17.2
NO_X	40.9

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Unrestricted Potential Emissions** (tons/year)
Xylene	10.7
Toluene	15.3
Methyl Ethyl Ketone	1.87
Methanol	0.179
Glycol Ethers	4.77
Benzene	0.0003
Dichlorobenzene	0.0001
Formaldehyde	0.010
Hexane	0.233

HAPs	Unrestricted Potential Emissions (tons/year)
Lead	0.00007
Cadmium	0.0001
Chromium	0.006
Manganese	0.00005
Nickel	0.002
Arsenic	0.00007
Cobalt	0.0002
Phosphorus	0.001
Naphthalene	0.0004
Phenanthrene/anthracene	0.0003
Pyrene	0.0002
Benz(a)anthracene/chrysene	0.0001
Benzo(a) pyrene	0.0001
TOTAL	33.1

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 9, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F 003-5768-00208; issued on December 9, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Three (3) spray paint booths (E1,E2,and E3)	43.8	43.8	-	95.5	-	-	9.0 individual 24.0 total
Two (2) fuel oil storage tanks, (Tanks 1 and 2)	-	-	-	0.07	-	-	Negligible
Insignificant Activities	1.05	0.982	0.079	4.32	17.2	40.9	Less than 1, total
Total PTE After Issuance	44.9	44.8	0.138	less than 100	17.2	40.9	Single less than 10 Total less than 25

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

(b) Allen County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

(a) The one (1) insignificant boiler rated at 0.63 million British thermal units per hour, constructed after June 9, 1989, is not subject to New Source Performance Standards (NSPS), 40 CFR Part 60, Subpart Dc, because the heat input capacity of the one (1) boiler is less than 2.9 megawatts (10 million British thermal units per hour).

(b) The two (2) fuel oil storage tanks constructed in 1990, known as Tanks 1 and 2, are exempt from the General Provisions (part 60, subpart A) and from the provisions of 40 CFR 60, Subpart Kb, except as specified in paragraphs (a) and (b) of Sec. 60.116b, because the storage vessels each have design capacities of less than 75 cubic meters. These tanks have a design capacity greater than 40 cubic meters (10,567 gallons), each. Therefore, they are subject to the New Source Performance Standards 40 CFR 60.116b(a) and (b) Subpart Kb, which requires that the Permittee keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The records will be kept for the life of the source.

(c) This source is not subject New Source Performance Standards (NSPS), 40 CFR 60, Subpart MM, because this source does not apply coatings to automobiles or light duty trucks as defined by 40 CFR 60.391.

(d) The insignificant maintenance cold cleaning degreasers are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because the insignificant maintenance cold cleaning degreasers do not use halogenated solvents.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD)

This motor freight and warehousing source is not 1 of the 28 major PSD source categories pursuant to 326 IAC 2-2. The three (3) spray paint booths were each constructed prior to 1975 which is prior to the August 7, 1977 applicability date of this rule. The potential-to-emit each of the criteria pollutants from the entire source is less than 250 tons per year. There have been no modifications since the source has been constructed prior to 1975 that have increase to the potential-to-emit of any criteria pollutant to 250 tons per year or more. Therefore, this source is considered a minor PSD source.

326 IAC 2-4.1-1 (New Source Toxics Control)

All facilities at this source were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potentials to emit CO, VOC, PM_{10}, NO_X and SO_2 are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

(a) The total amount of VOC delivered to the applicators at the three (3) spray paint booths (E1,

E2, and E3) shall not exceed 95.5 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit the potential to emit VOC from the entire source, including insignificant activities to less than one hundred (100) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7, not applicable.

(b) HAPs emissions will be limited as follows:

(1) The total worst case single HAP delivered to the coating applicators at the three (3) spray paint booths (E1, E2, and E3) shall not exceed 9.0 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit the potential to emit of a single HAP for the entire source, including insignificant activities, to less than ten (10) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

(2) The total combination of HAPs delivered to the coating applicators in the three (3) spray paint booths (E1, E2, and E3), shall not exceed a total of 24.0 tons per twelve (12) consecutive month period, rolled on a monthly basis. This will limit the potential to emit of the combination of HAPs from the entire source, including insignificant activities, to less than twenty-five (25) tons per year. Compliance with this limit shall make the requirements of 326 IAC 2-7 not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emissions)

The potential fugitive particulate matter emissions from the entire source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 6-5 are not applicable.

State Rule Applicability - Individual Facilities

326 IAC 6-2-3 (Particulate Emissions Limitations for Facilities Constructed prior to September 21, 1983)

The three (3) insignificant boilers, constructed in 1977, with a total heat input capacity of 7.56 million British thermal units per hour, must comply with the PM emission limitation of 326 IAC 6-2-3. This

limitation is based on the following equation is given in 326 IAC 6-2-3:

$$Pt = C \times a \times h / 76.5 \times Q^{0.75} \times N^{0.25}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty (60) minute time period.

N = Number of stacks in fuel burning operation.

a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input. The value 0.8 shall be used for Q greater than 1,000 mmBtu/hr heat input.

h = Average Stack height in feet.

For three (3) insignificant boilers, constructed in 1977, heat input capacity: 7.56 million British thermal units, total.

$$Pt = 50 \times 0.67 \times 19.5 / (76.5 \times (7.56)^{0.75} \times 3^{0.25}) = 1.42 \text{ lb/MMBtu}$$

Pursuant to 326 IAC 6-2-3(e), for Q less than 250 million British thermal units per hour, Pt shall not exceed 0.6 pound per million British thermal units. Therefore, the three (3) insignificant boilers are limited to emissions of 0.6 pound per million British thermal units.

Based on AP-42 emission factors, the PM emissions from each of the three (3) boilers is as follows: 1.9 lb PM /mmcf x 1 mmcf/1,000 MMBtu = 0.0019 lb PM/MMBtu

Therefore, the three (3) insignificant boilers will comply with this rule.

326 IAC 6-2-4 (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983)

The one (1) insignificant boiler, constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the one (1) boiler, constructed in 1994, is 0.63 million British thermal units per hour. There were three (3) insignificant boilers rated at 7.56 million British thermal units per hour, total in operation when this boiler was constructed.

$$Pt = 1.09/(8.19)^{0.26} = 0.63 \text{ lb/MMBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than 10 mmBtu/hr, Pt shall not exceed 0.6 pound per million British thermal units.

Based on AP-42 emission factors, the PM emissions from each of the four (4) boilers is as follows:
1.9 lb PM /mmcf x 1 mmcf/1,000 MMBtu = 0.0019 lb PM/MMBtu

Therefore, the one (1) insignificant boiler, constructed in 1994 will comply with this rule.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the three (3) spray paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters shall be in operation at all times the three (3) spray paint booths are in operation, in order to comply with this limit.

326 IAC 8-1-6 (General Provisions relating to VOC rules; general reduction requirements for new facilities)

The three (3) spray paint booths (E1, E2, and E3) were constructed before January 1, 1980. Therefore, 326 IAC 8-1-6 is not applicable.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The three (3) spray paint booths (E1, E2, and E3) were constructed prior to January 1, 1980 in Allen County and are not coating automobiles or light duty trucks. Therefore, 326 IAC 8-2-2 is not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This source does participate in miscellaneous metal coating operations at the three (3) spray paint booths (E1, E2, and E3). However, the three (3) spray paint booths were constructed prior to January 1, 1980 in Allen County. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-3-2 (Cold Cleaner Operation)

The insignificant maintenance cold cleaning degreasers were constructed after January 1, 1980. Therefore 326 IAC 8-3-2 is applicable. The following requirements shall apply to the operation of the insignificant cold cleaning degreasers:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operating requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner degreaser operation and control)

The insignificant maintenance cold cleaning degreasers were constructed after July 1, 1990, and are equipped with a remote solvent reservoir. Pursuant to 326 IAC 8-3-1(b)(2), 326 IAC 8-3-5 applies to cold cleaning degreasers without remote solvent reservoirs. Therefore, 326 IAC 8-3-5 is not applicable.

326 IAC 8-4-3 (Petroleum liquid storage facilities)

The insignificant fuel oil storage tanks have capacities of less than 150,000 liters (39,000 gallons). Therefore, 326 IAC 8-4-3 is not applicable.

326 IAC 8-4-6 (Gasoline Dispensing Facility)

The insignificant gasoline fuel transfer and dispensing operation does not fit the criteria for a gasoline dispensing facility as defined in 326 IAC 8-4-6 because diesel fuel is not considered “motor vehicle fuel” as defined by 326 IAC 8-4-6. Therefore, 326 IAC 8-4-6 is not applicable.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The three (3) spray paint booths, identified as E1, E2, and E3 were constructed prior to 1975. Therefore, construction of this source may have commenced after October 7, 1974, and did commence prior to January 1, 1980. The potential VOC emissions from this source are greater than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are applicable. Since the potential to emit VOC is limited to less than 100 tons per year, pursuant to 326 IAC 2-8-4, FESOP, the FESOP limit satisfies requirements of 326 IAC 8-6-2(a).

Testing Requirements

There are still no testing requirements for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

(a) The compliance monitoring requirements applicable to this source are as follows:

The three (3) spray paint booths have the following compliance monitoring requirements:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (E1, E2, and E3) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

(b) All compliance requirements from previous approvals were incorporated into this FESOP except the following:

Condition D.1.7, Daily Visible Emissions Notations, which states: Daily visible emissions notations of the spray booth stack exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: The daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required in this FESOP are sufficient compliance monitoring requirements to ensure compliance with the applicable rules.

Conclusion

The operation of this operation of a motor freight and warehousing source shall be subject to the conditions of the attached proposed FESOP No.: F 003-13899-00208.

Appendix A: Federal Potential Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Material	Density (lb/gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Material (gal/unit)	Maximum (unit/hour)	Flash-off (fraction)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (lbs/hr)	Potential VOC (lbs/day)	Potential VOC (tons/yr)	Particulate Potential (tons/yr)	VOC solids (lbs/gal)	Transfer Efficiency	Material Substrate
Three (3) spray paint booths (E1,E2, and E3)																		
Rooms A, C, D																		
Navl Blue	7.67	67.2%	0.00%	67.2%	0.00%	20.8%	2.50	0.38	1.00	5.15	5.15	4.90	118	21.4	5.23	24.8	50.0%	Aluminum
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	2.50	0.38	1.00	6.74	6.74	6.40	154	28.0	0.00	N/A	50.0%	Aluminum
R-T-S	7.21	82.5%	0.00%	82.5%	0.00%	10.4%	5.00	0.38	1.00	5.95	5.95	**11.30**	**271**	**49.5**	**5.23**	57.2	50.0%	Aluminum
Rooms A, C, D																		
Navl White	9.30	46.0%	0.00%	46.0%	0.00%	14.2%	1.25	0.38	1.00	4.28	4.28	2.03	48.8	8.90	5.22	30.1	50.0%	Aluminum
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	1.25	0.38	1.00	6.74	6.74	3.20	76.8	14.0	0.00	N/A	50.0%	Aluminum
R-T-S	8.02	68.7%	0.00%	68.7%	0.00%	7.1%	2.50	0.38	1.00	5.51	5.51	**5.23**	**126**	**22.9**	**5.22**	77.6	50.0%	Aluminum
Rooms A, C, D																		
Camcote	9.40	39.4%	0.00%	39.4%	0.00%	42.5%	7.00	0.38	1.00	3.70	3.70	9.84	236	43.1	33.2	8.71	50.0%	Aluminum
Wipe Down	6.71	100%	0.00%	100%	0.00%	0.00%	0.50	0.38	1.00	6.71	6.71	**1.27**	**30.6**	**5.58**	**0.00**	N/A	100%	Aluminum
Room A																		
Floor Repair	7.31	54.5%	0.00%	54.5%	0.00%	38.7%	0.50	0.38	1.00	3.98	3.98	**0.76**	**18.2**	**3.31**	**0.00**	10.3	100%	Wood
Room B																		
Navl White	9.30	46.0%	0.00%	46.0%	0.00%	14.2%	0.15	0.06	1.00	4.28	4.28	0.04	0.92	0.17	0.10	30.1	50.0%	Aluminum
Reducer	6.74	100%	0.00%	100%	0.00%	0.00%	0.15	0.06	1.00	6.74	6.74	0.06	1.46	0.27	0.00	N/A	50.0%	Aluminum
R-T-S	8.02	68.7%	0.00%	68.7%	0.00%	7.1%	0.30	0.06	1.00	5.51	5.51	**0.10**	**2.38**	**0.43**	**0.10**	77.6	50.0%	Aluminum
Room B																		
Wipe Down	6.71	100%	0.00%	100%	0.00%	0.00%	0.50	0.06	1.00	6.71	6.71	**0.20**	**4.83**	**0.88**	**0.00**	N/A	100%	Aluminum
Clean-up Sovent																		
gun cleaner	6.55	100.0%	0.00%	100.0%	0.00%	0.00%	0.13	1.00	1.00	6.55	6.55	**0.82**	**19.7**	**3.59**	**0.00**	N/A	100%	Aluminum
State Potential Emissions			**Add worst case coating to all solvents**					PM Control Efficiency	**95.00%**		**"worst case" uncontrolled total:**	**29.5**	**709**	**129**	**43.8**			
											"worst case" controlled total:	**29.5**	**709**	**129**	**2.19**			

Note* one (1) spray gun is used at a time while these paint booths are in operation

METHODOLOGY

RTS Density (lbs/gal) = ((Da*Va)+(Db*Vb))/(Va+Vb)
RTS Weight % H2O + Organics = ((Wa*Da*Va)+(Wb*Db*Vb))/((Da*Va)+(Db*Vb))

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * Flash-off
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day) * Flash-off
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs) * Flash-off
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids) * Flash-off
Total = RTS

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % MEK	Weight % Methanol	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	MEK Emissions (tons/yr)	Methanol Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)
Three (3) spray paint booths (E1,E2, and E3)													
Rooms A, C, D													
Navl Blue	7.67	2.50	0.38	23.00%	16.00%	4.00%	0.00%	0.00%	7.34	5.11	1.28	0.00	0.00
Reducer	6.74	2.50	0.38	0.00%	10.00%	0.00%	0.00%	11.00%	0.00	2.80	0.00	0.00	3.08
Naval White	9.30	1.25	0.38	17.00%	10.00%	3.00%	0.00%	0.00%	3.29	1.93	0.58	0.00	0.00
Reducer	7.21	1.25	0.38	0.00%	10.00%	0.00%	0.00%	11.00%	0.00	1.50	0.00	0.00	1.65
Camcote	9.40	7.00	0.38	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Wipe Down	6.71	0.50	0.38	0.00%	50.00%	0.00%	0.00%	0.00%	0.00	2.79	0.00	0.00	0.00
Room A													
Floor Repair	7.31	0.50	0.38	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Room B													
Navl White	9.30	0.15	0.06	17.00%	10.00%	3.00%	0.00%	0.00%	0.06	0.04	0.01	0.00	0.00
Reducer	7.21	0.15	0.06	0.00%	10.00%	0.00%	0.00%	11.00%	0.00	0.03	0.00	0.00	0.03
Wipe Down	6.71	0.50	0.06	0.00%	50.00%	0.00%	0.00%	0.00%	0.00	0.44	0.00	0.00	0.00
Clean-up Solvent													
Gun Cleaner	6.55	0.125	1.00	0.00%	17.00%	0.00%	5.00%	0.00%	0.00	0.61	0.00	0.179	0.00
								Individual HAP Total	**10.7**	**15.3**	**1.87**	**0.179**	**4.77**

Note* one (1) spray gun is used at a time while these paint booths are in operation **Overall Total HAPs** **32.8**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr	Insignificant Natural Gas Combustion except boilers
		Three (3) air make up units @ 10.45 mmBTU/hr, total
		Thirty-Seven (37) Tube Heaters @ 0.10 mmBTU/hr, each
		Forty-Two (42) Space Heaters @ 0.17 mmBTU/hr, each
21.3	186.5	

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.177	0.709	0.056	9.33	0.513	7.83

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Insignificant Natural Gas Combustion except boilers
Three (3) air make up units @ 10.45 mmBTU/hr, total
Thirty-Seven (37) Tube Heaters @ 0.10 mmBTU/hr, each
Forty-Two (42) Space Heaters @ 0.17 mmBTU/hr, each

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0002	0.0001	0.007	0.168	0.0003

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	0.00005	0.0001	0.0001	0.00004	0.0002	0.176

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Insignificant Natural Gas Combustion boilers
Two (2) boilers @ 3.00 mmBTU/hr, each
One (1) boiler @ 1.56 mmBTU/hr
One (1) boiler @ 0.63 mmBTU/hr

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
8.19	71.7

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.068	0.273	0.022	3.59	0.197	3.01

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 6 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAPs Emissions

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Insignificant Natural Gas Combustion boilers
Two (2) boilers @ 3.00 mmBTU/hr, each
One (1) boiler @ 1.56 mmBTU/hr
One (1) boiler @ 0.63 mmBTU/hr

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.0001	0.00004	0.003	0.065	0.0001

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel	Total
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03	HAPs
Potential Emission in tons/yr	0.00002	0.00004	0.00005	0.00001	0.00008	0.068

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Waste Oil Combustion

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Two (2) Insignificant Waste Oil Burners

Heat Input Capacity MMBtu/hr	Potential Throughput kgals/year			
		A =	Weight % Ash =	1.09%
		L =	Weight % Lead =	0.001%
1.00	63.0215827	S =	Weight % Sulfur =	0.41%

	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	Pb
Emission Factor in lb/kgal	0.031 *(2.8A)*	0.00 *(ND)*	0.4 *(100S)*	11.0	1.0	1.7	2.050E-06 *(0.41L)*
Potential Emission in tons/yr	0.001	0.00	0.013	0.347	0.032	0.054	0.00000006

*No information was given in AP-42 regarding whether the PM/PM10 emission factors included filterable and condensable PM.

Methodology

Emission Factor Units are lb/1000 gal
ND = No data was available for the PM10 emission factor.
A = weight% ash in fuel, L = weight% lead in fuel, S = weight % sulfur in fuel
Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.139 MM Btu
Emission Factors from AP-42, Chapter 1.11, SCC 1-05-001-14 (Supplement B 10/96)
Emission (tons/yr) = Throughput kgals per year x Emission Factor (lb/kgal)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).
See page 8 for HAPs calculations.

Appendix A: Emissions Calculations
Waste Oil Combustion
HAPs Calculations

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

Two (2) Insignificant Waste Oil Burners

HAPs - Metals

	Arsenic	Chromium	Cobalt	Nickel	Phosphorus
Emission Factor in lb/kgal	2.5E-03	1.9E-01	5.7E-03	5.0E-02	3.6E-02
Potential Emission in tons/yr	0.0001	0.006	0.0002	0.002	0.001

HAPs - Organics

	Naphthalene	Phenanthrene/ anthracene	Pyrene	Benz(a)anthracene/chrysene	Benzo(a) pyrene	Total HAPs
Emission Factor in lb/kgal	1.3E-02	1.1E-02	7.1E-03	4.0E-03	4.0E-03	
Potential Emission in tons/yr	0.0004	0.0003	0.0002	0.0001	0.0001	0.010

Methodology is the same as previous page.
The five metal and five organic HAPs with the highest emission factors are presented above.
Additional emission factors for addtional HAPs with smaller emission factors are available in AP-42, 5th edition (Supplement B 10/96).

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>600 HP)

Company Name: North American Van Lines
Address City IN Zip: 5001 U.S. Highway 30 West, Fort Wayne, Indiana 46818
FESOP: 003-13899
Plt ID: 003-00208
Reviewer: Michael S. Schaffer
Date: February 8, 2001

One (1) insignificant emergency generator @ 2200 hp
One (1) insignificant emergency generator @ 2400 hp

Emissions calculated based on output rating (hp)

Power Output Horsepower (hp)	Potential Throughput based on 500 hours hp-hr/yr	S= 0.50% = WEIGHT % SULFUR
4600	2300000.0	

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/hp-hr	0.0007	not provided	0.00004 *(.00809S)*	0.024 **see below	0.00071	0.00550
Potential Emission in tons/yr	0.805	0.0	0.047	27.6	0.811	6.33

**NOx emission factor: uncontrolled = 0.024 lb/hp-hr, controlled by ignition timing retard = 0.013 lb/hp-hr
Note that the PM10 emission factor in lb/hp-hr is not provided in the Supplement B update of AP-42.
An average conversion factor of 1hp-hr = 7,000Btu is provided below.

Methodology

Potential Througput (hp-hr/yr) = hp * 500 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96)Table 3.4-1 and Table 3.4-2
1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.
Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)
Emission (tons/yr) = [Potential Throughput (hp-/hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.